

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In Re:

Virginia Karros

Case No.: 24-12353Judge: Christine M. GravelleChapter: 13**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION**The debtor in this case opposes the following (**choose one**):

1. ☐ Motion for Relief from the Automatic Stay filed by \_\_\_\_\_ ,  
creditor,

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for \_\_\_\_\_, at \_\_\_\_\_.

- ☒ Certification of Default filed by PNC Bank, NA,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$ \_\_\_\_\_, but have not  
been accounted for. Documentation in support is attached.

☒ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

Due to my debilitating migraines and other health issues, I have had medical co-pays and prescriptions that needed to be paid for. I will be able to make a payment to PNC Bank by January 15, 2025 to bring my account current. I am hoping to feel well enough to meet with a realtor within the next week or so to list the property for sale. I will be filing a modified Chapter 13 Plan to sell the

☒ Other (**explain your answer**):

residence since I do not qualify for a reverse mortgage. I will resume making the required payments to PNC Bank starting January 2025 and will continue to do so until such time as the property sells.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: 12/19/24

/s/ Virginia Karros  
Debtor's Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Debtor's Signature

**NOTES:**

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.